

Fill in this information to identify the case:

Debtor 1 William C Offley

Debtor 2 Mary L Offley
(Spouse, if filing)

United States Bankruptcy Court for the: Western District of Pennsylvania

Case number 18-20195-CMB

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: Wilmington Trust, National Association, not in its individual capacity, but solely as trustee of MFRA Trust 2016-1 Court claim no. (if known) 24

Last 4 digits of any number you use to identify the debtor's account: XXXXXX9501

Property address: 305 Arch Street
Number Street

Mars PA 16046
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on : 07 / 17 / 2023
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow, and costs outstanding + (b) \$ _____
- c. Total. Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

 / /
MM / DD / YYYY

Debtor 1 William C Offley

Case number (if known) 18-20195-CMB

First Name

Middle Name

Last Name

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs the creditor must attach an itemized payment history disclosing the following amount from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box:

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applied.

/s/ Roger Fay, Esq., ID No. 315987
Signature

Date July 20, 2023

Print Roger Fay, Esquire
First Name Middle Name Last Name

Title Attorney for Creditor

Company Milstead & Associates, LLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 14000 Commerce Parkway, Suite H
Number Street

Mount Laurel NJ 08054
City State ZIP Code

Contact phone: (856) 724-1888

Email: rfay@alaw.net

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
William C Offley	:	Bankruptcy No. 18-20195-CMB
Mary L Offley,	:	Chapter 13
Debtors,	:	
	:	
Wilmington Trust, National Association, not in	:	
its individual capacity, but solely as trustee of	:	
MFRA Trust 2016-1,	:	
Secured Creditor,	:	
	:	
William C Offley and Mary L Offley,	:	
Debtors / Respondents,	:	
	:	
and	:	
Ronda J. Winnecour,	:	
Trustee / Respondent.	:	

**CERTIFICATION OF SERVICE OF
RESPONSE TO NOTICE OF FINAL CURE PAYMENT**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on July 20, 2023. The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: electronic notification and first-class mail.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

Service by Electronic Notification:

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219
Email: cmecf@chapter13trusteedpa.com

Brian C. Thompson
Thompson Law Group, P.C.
125 Warrendale Bayne Road
Suite 200
Warrendale, PA 15086
Email: bthompson@ThompsonAttorney.com

Service by First Class Mail:

William C Offley
PO Box 64, 305 Arch St.
Mars, PA 16046

Mary L Offley
PO Box 64, 305 Arch St.
Mars, PA 16046

Dated: July 20, 2023

By: /s/ Roger Fay
Signature

Roger Fay, Esquire
Typed Name

14000 Commerce Parkway, Suite H
Mount Laurel, NJ 08054
Address

(856) 724-1888
Phone No.

315987, Pennsylvania
List Bar I.D. and State of Admission
rfay@alaw.net
Attorneys for Secured Creditor
PAWB Local Form 7 (07/13)